

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

Defendants.

* * * * *

DECLARATION OF CHLOE GREY

I, Chloe Grey, testify to the following:

1. That I am over the age of 18 years old and am competent to testify.
2. I was previously incarcerated at Western Correctional Institution (WCI) and Patuxent Institution (Patuxent) between 2016 and late 2023.
3. I am now incarcerated at North Branch Correctional Institution (NBCI).
4. After coming out as transgender and beginning my transition in 2021. I submitted Administrative Remedy Procedures (ARPs) at WCI related to my treatment there.
5. I submitted these ARPs before and after May 2023.
6. In these ARPs, I described my complaints related to verbal abuse by correctional staff, failure to respect my gender identity, and failure to place me in a women's facility in accordance with my gender identity to keep me safe from male inmates.
7. I have attached copies of some of my ARPs to this Declaration.
8. While staff at WCI acknowledged receipt of these ARPs, there was no formal decision on any of them.

9. As a result, I had no formal decision to appeal and bring to the Inmate Grievance Office.

10. Even if I could appeal a non-decision, I was not given the appeal forms or proper instructions on how to appeal a non-decision.

11. I was placed into administrative segregation shortly after arriving at Patuxent.

12. In administrative segregation, I had no access to pens or paper, and no access to ARP forms after November 6th..

13. Verbal complaints about my treatment were ignored by staff at Patuxent, and I was left without a process to challenge my situation within Patuxent.

14. I have continued to have issues with submitting ARPs at NBCI.

15. I continue to have to rely on officers to submit ARPs.

16. Even when I have received a reply on an initial ARP, officers have not provided me with appeal forms.

17. I cannot appeal an ARP without appeal forms. When I complain about not obtaining appeal forms, officers tell me to go to the library.

18. I am currently unable to go to the library because I am on administrative segregation.

19. I am currently unable to file a PREA complaint because I don't have access to a tablet/phone.

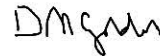
20. Officers refuse to take my PREA complaints.

21. I have been unable to convey documents to my attorneys during in-person legal visits. NBCI staff have told me and my attorneys that I must mail the documents to my attorneys.

22. I have reviewed this declaration with counsel. NBCI policies will not allow me to sign it when meeting with my attorneys, so I am directing my attorney to sign it for me. I understand that a copy will be mailed to me, inspected by the prison, and given to me to sign and mail back to my counsel. That directly signed copy will be provided to the Court as well.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 9, 2024



Deborah Golden (for Chloe Grey)

Signed on _____

Chloe Grey